

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

**IN RE WASHINGTON MUTUAL, INC.
SECURITIES & ERISA LITIGATION**

No. 2:08-md-1919 MJP

**IN RE WASHINGTON MUTUAL, INC.
SECURITIES LITIGATION**

Lead Case No. C08-387 MJP

This Document Relates to: ALL CASES

PLC-12

**DECLARATION OF CHAD JOHNSON
IN SUPPORT OF LEAD PLAINTIFF'S
MOTION FOR CLASS
CERTIFICATION**

Note on Motion Calendar:
August 4, 2010

Oral Argument Requested

DECL. OF CHAD JOHNSON IN SUPPORT OF
LEAD PLTF'S MOTION FOR CLASS CERT.
Case No.: 2:08-md-1919 MIP

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP

1285 Avenue of the Americas, New York, New York 10019

Tel: (212) 554-1400 · Fax: (212)554-1444

1 I, Chad Johnson, hereby state as follows:

2 1. I am a Partner with the law firm of Bernstein Litowitz Berger & Grossmann LLP
 3 and Counsel for Lead Plaintiff Ontario Teachers' Pension Plan Board and Lead Counsel for the
 4 Class in the above-entitled action. I am a member in good standing of the Bar of the State of
 5 New York and am admitted to appear *pro hac vice* in this action. I respectfully submit this
 6 declaration in support of Lead Plaintiff's Motion for Class Certification. I have personal
 7 knowledge of the facts set forth herein and, if called upon to do so, could and would competently
 8 testify thereto.

9 2. Annexed hereto as exhibits are true and correct copies of the following:

<u>Exhibit No.</u>	<u>Description</u>
A	Expert Report of Chad Coffman, Chartered Financial Analyst
B	Declaration Of In Ha Jang In Support Of The Application Of Lead Plaintiff Ontario Teachers' Pension Plan Board For Appointment As Class Representative
C	Declaration Of Paul D. O'Connell In Support Of The Application Of Pompano Beach Police And Fire Retirement System For Appointment As Class Representative
D	Declaration Of Harlan R. Seymour In Support Of His Application For Appointment As Class Representative
E	Declaration Of Harold P. Hanna In Support Of The Application Of Brockton Contributory Retirement System For Appointment As Class Representative
F	Declaration Of Cynthia Thomas In Support Of The Application Of The Police And Fire Retirement System Of The City Of Detroit For Appointment As Class Representative
G	Firm Resume of Bernstein Litowitz Berger & Grossmann LLP
H	Resume of Bradley S. Keller, Esq., Byrnes Keller & Cromwell LLP

3. The resumes of Bernstein Litowitz Berger & Grossmann LLP and Bradley S. Byrnes, Esq. are being submitted in connection with the Court's consideration of the adequacy of counsel prerequisite subsumed in Rule 23(a)(4) of the Federal Rules of Civil Procedure.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 30th day of April, 2010, in New York, New York.

/s/ Chad Johnson
CHAD JOHNSON

DECL. OF CHAD JOHNSON IN SUPPORT OF
LEAD PLTF'S MOTION FOR CLASS CERT.
Case No.: 2:08-md-1919 MIP

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
1285 Avenue of the Americas, New York, New York 10019
Tel: (212) 554-1400 · Fax: (212) 554-1444

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2010, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the e-mail addresses on the Court's Electronic Mail Notice List.

BERNSTEIN LITOWITZ BERGER &
GROSSMANN LLP
By: /s/ Chad Johnson
Chad Johnson (*pro hac vice*)
Hannah Ross (*pro hac vice*)
Jerald Bien-Willner (*pro hac vice*)
Katherine M. Sinderson (*pro hac vice*)
1285 Avenue of the Americas
New York, New York 10019
Tel: (212) 554-1400
Fax: (212) 554-1444
Email: chad@blbglaw.com
hannah@blbglaw.com
jerryb@blbglaw.com
katherine@blbglaw.com

-and-

Timothy A. DeLange (*pro hac vice*)
Jon F. Worm (*pro hac vice*)
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0070
Fax: (858) 793-0323

*Counsel for Lead Plaintiff
Ontario Teachers' Pension Plan Board
and Lead Counsel for the Class*

BYRNES KELLER & CROMWELL LLP
Bradley S. Keller, WSBA# 10665
Jofrey M. McWilliam, WSBA# 28441
1000 Second Avenue, Suite 3800
Seattle, Washington 98104
Tel: (206) 622-2000
Fax: (206) 622-2522
Email: bkeller@byrneskeller.com
jmcwilliam@byrneskeller.com

Liaison Counsel for the Class

DECL. OF CHAD JOHNSON IN SUPPORT OF
LEAD PLTF'S MOTION FOR CLASS CERT.
Case No.: 2:08-md-1919 MIP

Case No.: 2:08-md-1919 MJP

BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP
1285 Avenue of the Americas, New York, New York 10019
Tel: (212) 554-1400 · Fax: (212) 554-1444